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January 6, 2020

**VIA ECF**

Hon. Mark Falk, U.S.M.J.  
United States District Court  
Martin Luther King, Jr. Federal Courthouse  
50 Walnut Street  
Newark, NJ 07102

**RE: Immunex Corporation, et al. v. Samsung Bioepis Co., Ltd.,**  
**Civil Action No. 19-11755 (CCC/MF)**

Dear Judge Falk:

This firm, together with Sidley Austin LLP, represents Plaintiffs Immunex Corporation and Amgen Manufacturing, Limited in connection with the above-referenced matter. Pursuant to Local Civil Rule 5.3, the Joint Motion to Seal the letter from Liza M. Walsh to the Hon. Claire C. Cecchi, U.S.D.J. and Confidential Stipulation, dated December 23, 2019 at DE No. 105, is due to be filed with the Court on January 6, 2020. On behalf of the parties, we write to respectfully request an extension until one week after the Court enters the Confidential Stipulation to file the Joint Motion to Seal the above referenced material. The additional time is necessary so the parties have sufficient time to coordinate and finalize both the proposed redactions to the correspondence, confidential stipulation, and Joint Motion to Seal. Additionally, in light of the parties' pending applications, we respectfully request a two-week extension, until January 23, of the January 9 deadline (DE 104) to submit a proposed Discovery Confidentiality Order to the Court.

We appreciate the Court's consideration of these requests and, should these extensions be acceptable to Your Honor, we respectfully request this letter be "So Ordered" and entered on the docket. As always, we thank the Court for its attention to this matter and remain available should Your Honor or Your Honor's staff have any questions.

Respectfully submitted,

*s/Marc D. Haefner*

Marc D. Haefner

cc: All counsel of record (via ECF and email)

SO ORDERED this \_\_\_\_ day of January, 2020

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